

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

*Pate v. Zhejiang Huahai Pharmaceutical  
Co., Ltd, et al.  
(Case No. 1:20-cv-01248-RBK-JS)*

**CROSS NOTICE OF VIDEOTAPED DEPOSITION OF  
PATRICIA JACOB**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Plaintiff will take the deposition upon oral examination of PATRICIA JACOB, on **November 9, 2021, at 11:00 a.m. EST**, and continuing until completion, via Zoom Video Conference. Counsel who wish to attend remotely should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interest in the events of this case.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B(1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the deposition. The attorney contact for the deposition is:

Paige N. Boldt  
Watts Guerra LLC  
5726 Hausman Rd., Suite 119  
San Antonio, TX 78249  
[pboldt@wattsguerra.com](mailto:pboldt@wattsguerra.com)

Date: November 8, 2021

Respectfully submitted,

*/s/ Paige N. Boldt*  
Paige N. Boldt  
WATTS GUERRA LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: [pboldt@wattsguerra.com](mailto:pboldt@wattsguerra.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of November 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Patricia Jacob to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on November 8, 2021.

This 8th day of November 2021.

*/s/ Paige N. Boldt*  
Attorney for Plaintiff

**Exhibit A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.